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July 12, 2022

VIA EMAIL

Mr. Robert Finamore
Chief, Foreign Air Carrier Licensing Division
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

Re: Polynesian Limited d/b/a Samoa Airways—Request for
Extension of Cabotage Operations, Docket DOT-OST-2014-0144

Dear Mr. Finamore:

In accordance with the Department of Transportation's *Notice of Action Taken* dated January 26, 2022, in the captioned docket, and the FAA Reauthorization Act of 2018, I am writing on behalf of Polynesian Limited d/b/a Samoa Airways ("Samoa Airways") to request approval of additional cabotage operations beyond July 26, 2022, through January 23, 2023, between Pago Pago and the Manu'a Islands.¹

The circumstances described in Samoa Airways' January 7, 2022, exemption application continue without change.² Samoa Airways' application

¹ The FAA Reauthorization Act of 2018 amended Section 40109(g) authorizing the Department to approve cabotage operations between American Samoa and Tutuila and Manu'a for up to 180 days, rather than thirty days.

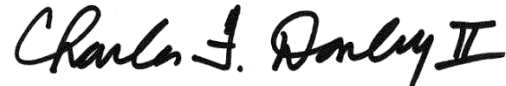
² The Department approved Samoa Airways' exemption application on January 26, 2022, for a period of 180 days and deferred action on the remainder of Samoa Airways' twelve-
(... continued)

continues to meet the requirements of 49 USC 40109(g) for grant of an emergency cabotage exemption. The Pago Pago-Manu'a Islands route is still without U.S. carrier service and there is no indication this will change. Samoa Airways remains able to provide transportation between the two points, thus preventing severe hardship to American Samoa residents (who could otherwise be required to travel between the islands by boat). In the past six months, Samoa Airways operated approximately sixty roundtrip and twenty one-way flights transporting more than 1,700 passengers (in addition to more than fifty passengers who required medical evacuation on nine flights) using DHC6-300 aircraft. There is a clear need for continued cabotage service through January 23, 2023. Samoa Airways' Pago Pago-Manu'a Islands service is also fully supported by the American Samoa government, which has previously submitted letters confirming the need for the service.

Approval is also supported by comity and reciprocity between the United States and the Government of Samoa. The Department has previously acknowledged the Samoan Government's assurances that comity and reciprocity should continue to form the basis for approving carrier operations after July 26, 2022.³

Please contact the undersigned with any questions.

Very truly yours,



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month request. *Notice of Action Taken*, Docket DOT-OST-2014-0144, January 26, 2022. Samoa Airways now requests approval of the remainder of its request.

³ The Department previously acknowledged receipt of the Samoan Government's diplomatic note containing these assurances. See, *Notice of Action Taken*, Docket DOT-OST-2019-0037, March 8, 2019.